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adapted to be supported stationary with respect to said wall and connected to said hub assemblies, respectively, for holding said hub assemblies stationary to anchor said opposite ends of said springs.

#### REMARKS

Responsive to the Office Action, Applicants have amended Claims 1, 12, 22, 23, 25, 28 and 31 to overcome the rejection of Claims 1 through 31 under 35 U.S.C. 112 and also to more clearly distinguish Claims 25 and 31 over the prior art of record. Reconsideration for allowance of Claims 1 through 31 and 33 through 35 is respectfully requested for the reasons set forth hereinbelow.

With regard to the Examiner's rejection of Claims 1 through 35 under 35 U.S.C. 112, Applicants have amended Claim 1 to include the functional recitation "adapted to be" where believed to be appropriate. Claim 12 has been amended to obviate the ambiguity regarding bearing "means" and the "bearing retainers". Claims 22 and 23 have been amended to delete the term "means". Claim 25 has been amended to include the functional recitation "adapted to be". Claim 25 has also been amended to clearly distinguish over the prior art. Claim 31 has been amended to include functional recitation and also to clearly distinguish this claim over the prior art by incorporating the recitation of canceled Claim 32 therein. The above-mentioned amendments are believed to overcome the rejection of Claims 1 through 35 under 35 U.S.C. 112.

In the Office Action, the Examiner rejected Claims 1 through 35 under 35 U.S.C. 102(b) as being anticipated by the disclosure of U.S. Patent 5,636,678 to Carper et al. The Carper et al. reference discloses a counterbalance mechanism for an upward acting sectional door wherein opposed cable drums (44, 244) and (46, 246) are mounted on and keyed to a rotatable shaft (34, 242). Opposed torsion coil springs are sleeved over the shaft and are fixed at one end to the shaft, respectively. In the embodiment of Figure 8, a telescoping tube assembly (252) is sleeved over the torsion coil springs and is secured at opposite ends of tube sections (254) and (256) to winding mechanism housings, as shown in Figure 9, for example. The winding mechanisms of the Carper et al. reference are connected to one end of the respective torsion coil springs for adjusting the torsional windup of the springs and the opposite ends of the springs are connected to hub assemblies which are secured to the cable drum shafts (32) or (242) for imposing torque on the shafts to be transmitted through the cable drums and the counterbalance cables wound thereon, respectively.

The Carper et al. reference does not disclose a counterbalance system wherein a tube, which is disposed in sleeved relationship over the counterbalance spring or springs, is operably connected to one end of the spring or springs and to a winding mechanism wherein the winding mechanism is operable to rotate the tube to rotate the end portion of the spring to adjust the torque applied by the spring to a cable drum or the

like. The only function of the tube assembly (252) of Carper et al. is to provide a protective cover over the coil springs.

Contrary to the disclosure of the Carper et al. reference, Claim 1 recites a torsion spring having opposed end portions, one of said end portions being ~~connected to~~ one of said cable drums, together with an elongated tube disposed in sleeved relationship over said spring and operably connected to the other end portion of said spring. Claim 1 also recites a winding mechanism connected to the tube and operable to hold the tube stationary during normal operation of the counterbalance system, the winding mechanism being operable to rotate the tube to rotate the other end portion of the spring to adjust the torque applied by the spring to the cable drum. In at least these respects, Claim 1 is believed to distinguish over Carper et al. which does not include a winding mechanism operable to rotate a tube configured as recited in Claim 1 to adjust the torque applied to the springs of Carper et al.

Claims 2 through 24 remain in the application dependent on Claim 1 and are believed to patentably distinguish over the Carper et al. reference as well as the other art of record at least for the reasons set forth above in support of the patentability of Claim 1. Reconsideration for allowance of Claims 1 through 24 is respectfully requested.

Claim 25 has been amended to recite that each of elongated spring winding tubes supported by spaced apart brackets for the counterbalance system are disposed in sleeved relationship over respective torsion coil springs and wherein each of the tubes is

connected to one of hub assemblies connected to the ends of the torsion coil springs nonrotatably with respect to the hub assemblies, respectively, and for holding the ends of the springs nonrotatable with respect to the system mounting brackets. Claim 25 further recites spring winding mechanisms for adjusting the torsional windup of the springs by selectively rotating respective ones of the tubes to rotate the hub assemblies connected to the springs and thus the ends of the springs opposite the ends which are connected to the cable drums. In at least these respects, Claim 25 is also believed to patentably distinguish over the Carper et al. reference as well as the other art of record in this application.

Claims 26 through 30 remain in the application dependent on amended Claim 25 and are also believed to be patentable at least for the reasons set forth in support of the patentability of Claim 25. Reconsideration for allowance of Claims 25 through 30 is respectfully requested.

Claim 31 has been amended to recite, in a counterbalance system, that each of opposed hub assemblies in the counterbalance system, are connected to ends of respective springs, and the counterbalance system includes opposed elongated tubes disposed in sleeved relationship over the springs and adapted to be supported stationary with respect to a wall and connected to the spring hub assemblies for holding the hub assemblies stationary to anchor the ends of the springs. As pointed out hereinabove, the arrangement of the tube assembly (252) of Carper et al. is not connected to a hub assembly for a

torsion spring for holding the hub assembly and to anchor a spring associated therewith. Accordingly, Claim 31 is believed to distinguish over Carper et al. as well as the other art of record.

Claims 33 through 35 remain dependent on Claim 31 and are believed to be patentable for the reasons set forth above in support of the patentability of Claim 31. Reconsideration for allowance of Claim 31, as amended herein, together with Claims 33 through 35, is respectfully requested.

Applicants have made a diligent effort to advance the prosecution of this application by amending claims to conform to the requirements of 35 U.S.C. 112 and to distinguish patentably over the prior art and by pointing out with particularity herein how the claims distinguish in a patentable sense. Accordingly, an early Notice of Allowance of Claims 1 through 31 and 33 through 35 is respectfully solicited.

Respectfully submitted,

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